

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

LONZO PATRICK

Defendant.

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)  
) No. 4:17-CR-519-RLW  
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**MOTION TO CONTINUE TRIAL SETTING**

Comes now Defendant, Michael Finley, through his attorney, Melissa Goymerac, Assistant Federal Public Defender, and requests this Court continue the trial in this case for a period of 30 days.

In support thereof, Defendant states the following:

1. This matter is set for trial on July 22, 2019;
2. Counsel for the government sent a plea offer for a negotiated disposition of this matter that will not require a trial, and counsel for the defendant has submitted a detailed counter-offer;
3. Counsel has discussed the matter thoroughly with Mr. Patrick, who is in agreement with this request and has previously executed a waiver of Speedy Trial
4. A continuance in this matter is in the interests of justice as it allows a reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161.
5. The government has no objection to this request.
6. Defendant requests the trial of this matter be continued for 30 days and reset on a date convenient for this Court.

WHEREFORE, defendant requests this Court grant his request to continue the trial of this matter from July 22, 2019 for 30 days, and reset on a date convenient for this Court.

Respectfully submitted,

/s/ Melissa K. Goymerac  
MELISSA K. GOYMERAC  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bird, Assistant United States Attorney.

Respectfully submitted,

/s/ Melissa K. Goymerac  
MELISSA K. GOYMERAC  
Assistant Federal Public Defender